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UNDERGROUND STORAGE TANK UNAUTHORIZED RELEASE (LEAK) / CONTAMINATION SITE REPORT						
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LAW OFFICES

RANDICK & O'DEA

ROBERT A. RANDICK, JR.
BRIAN M. O'DEA
BERNARD F. ROSE, Ph.D.
JULIE M. ROSE

WILLIAM J. TRINKLE

1800 HARRISON, SUITE 2350 OAKLAND, CALIFORNIA 94612

TELEPHONE (510) 836-3555

TELECOPIER (510) 634-4748

LISA ROBINSON SWANSON

October 21, 1996

VIA FACSIMILE TRANSMISSION

Ms. Madhulla Logan Hazardous Material Specialist Alameda County Health Care Services Department of Environmental Health 1131 Harbor Bay Parkway Alameda, CA 94502-6577

Re: Former Eagle Packaging - 948 88th Street, Oakland,

California

Dear Ms. Logan:

As I mentioned to you during our telephone conversation last week, this firm represents a potential purchaser of the above-referenced property. We were retained to assist him in corroborating the seller's statement that the site, which was encumbered with low levels of contamination, was in fact scheduled for closure by Alameda County and the regional board.

You indicated that it indeed was your decision to close the site and that the regional board, through Mr. Sum Arigala, had concurred.

Since, in all likelihood, my client will have to close escrow on the property before the site closure paperwork is completely done, we just wanted to be sure that your and the regional board's plans for closure did not include any special requirements or restrictions that might later affect the use of the property.

As I understand it, based on our conversation, there are no such requirements or restrictions, other than that the three (3) monitoring wells presently on the property will have to be properly destroyed, that are being contemplated by either Alameda County or the regional board.

If my understanding is incorrect and there are restriction(s)/requirement(s) other than the destruction of the monitoring wells that are to be, or are being considered to be, included as part of the closure documents, it would be very much appreciated if you would give me a call today, Monday the 21st or tomorrow, Tuesday the 22nd so that we might discuss the situation a bit further.



Allwaste Transportation & Remediation, Inc.

2 August, 1996

Ms. Madula Logan Alameda County Environmental Health Department 1131 Harbor Bay Parkway, Suite 250 Alameda, California 94502-6577

RE: Subsurface Investigation - 948 88th Street San Leandro, California

Dear Ms. Logan:

The following letter report documents the grab water sample obtained by Allwaste Transportation and Remediation (ATR) at the former Eagle Packaging Facility located at 948 88th Street in San Leandro, California. On 29 July 1996 ATR personnel along with a Geoprobe unit advanced a boring to 23 feet below ground surface in order to obtain a water sample.

Upon completion of the push, a one inch diameter well casing was emplaced in the hole and a sample consisting of 4 40ml VOA vials was obtained. The sample was labeled, placed on ice and submitted to a State certified analytical laboratory under Chain Of Custody to be analyzed for Volatile Organic Compounds by EPA Method 8240.

The laboratory analytical results showed that the water contained 80 micrograms per liter (ug/l or ppb) of Tetrachloroethene and 33 ppb of Trichloroethene. All other 8240 compounds were not detected above laboratory reporting limits. The concentrations are slightly higher than those noted in the May 1996 monitoring well sampling event but are consistent with what is normally seen in an undeveloped boring. The concentrations noted in this last soil boring was consistent with the results from boring B7 in May of 1995. When the monitoring wells were later installed in February 1996, the concentrations were greatly reduced.

The depth to groundwater in the hydropunch was measured at 10.10 feet. Based on this and measurements of MW-2 and MW-3 obtained at the time of the boring groundwater gradient is determined to be towards the southwest, as was previously thought.

Based on the information provided ATR believes that no further action is necessary on this site. A letter documenting deed restrictions will follow the next 5 days for the county's review. Please contact me at (800) 321-1030 if you have any questions or comments regarding this report.

Sincerely,

ALLWASTE TRANSPORTATION AND REMEDIATION

Chris Merritt

Senior Geologist/Project Manager

CC: Kevin Gordon Package Material Corporation

Sum Arigala RWQCB

MERRITT

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PAGE

02



Allwaste Transportation & Remediation, Inc.

9 July 1996

Ms. Madule Logan Alameda County Department of Environmental Health 1131 Harborbay Parkway, Suite 250 Alameda, California 94502

Re:

948 88th Avenue, Oakland, California Former Eagle Puckaging Facility

Dear Ms. Logan:

Per you request, Allwaste Transportation and Remediation, Inc. (ATR) is pleased to submit this letter of clarification on behalf of the Package Machinery Company. Your request for gradient calculations is as follows:

ATR believes that the groundwater flow is to the west-southwest based on topographic observations and groundwater elevations collected at the site during monitoring well installation and sampling. However, an exact flow direction can not be calculated due to the County's request to install the wells in a linear fashion to capture site contamination data in areas of greatest concern, and not flow data. In addition, MW-1 and MW-2 have virtually the same elevation with respect to each other, while MW-3 has had a slightly higher elevation each time measured.

	MW-I	<u>MW-2</u>	<u>MW-3</u>
Casing Elevation	101.51	100.84	100.07
Depth to GW (2/20/96)	6.20	7.33	<u>6.59</u>
GW Elevation	95.31	93.51	93.48
Casing Elevation	101.51	100.84	100.07
Depth to GW (5/10/96)	8.90	9.45	<u>8.70</u>
GW Elevation	92.61	91.39	91.37

The project north referenced on the well map is assumed north, as surveyed by Morrow Surveying, a State licensed company. The flow direction estimate that was reported was based on the project north as a reference.

I believe this information will assist you and the RWQCB in recommending site closure. As previously discussed in the report, the concentrations have been eliminated or degraded over the last year, suggesting passive degradation. In addition, no public wells are located within 0.5 miles of the site.

If you need any further information please call.

Sincerely,

Allwaste Transportation and Remediation, Inc.

Assistant General Manager

Roger Dockter, RG Associate Geologist AGENCY DAVID J. KEARS, Agency Director



RAFAT A. SHAHID, DIRECTOR

DEPARTMENT OF ENVIRONMENTAL HEALTH 1131 Harbor Bay Parkway Alameda, CA 94502-6577

(510) 567-6777

Mr. Kevin Gordon
Package Machinery Company
24 Scitico Road
Somersville, Connecticut - 06072

Ref: Former Eagle Packaging - 948, 88th Street, Oakland, CA

STID 539

Dear Mr. Gordon:

April 8, 1996

I am in receipt of the document "Soil and Groundwater Investigation Report", dated March 1996, prepared by Allwaste Transportation and Remediation, Inc for the above referenced property. This Department has reviewed the report and has the following recommendations to move this case towards site closure:

- Based on the information submitted to this Department, both soil and groundwater samples have been collected from the recently installed borings/ monitoring wells. The laboratory analysis of the groundwater samples collected from the three monitoring wells indicated concentrations of tetrachloroethylene up to 29 ppb and trichloroethene up to 14 ppb, which are above the California MCL's (Maximum Contaminant Levels). In lieu of these concentrations, at least 1 more quarter of groundwater monitoring should be performed on all the 3 monitoring wells and the samples should be analyzed for volatiles using EPA method 8010.
- Also, to facilitate site closure pertaining to groundwater issues in areas where water may not
 be suitable for drinking, the California Regional Water Quality Control Board would require
 that the site meets the following condition to confirm that the groundwater is unsuitable for
 domestic water supply:
 - Total dissolved solids (TDS) exceeding 3,000 mg/l
 - The water source does not provide sufficient water to supply a single well capable of producing an average, sustained yield of 200 gallons per day.

Hence please provide data on the TDS values, or/and the yield at the site.

• This Department concurs with your recommendation that no further action is necessary with the soils issue in the vicinity of the former underground storage tank area. However, in the next quarterly groundwater monitoring event, monitoring well, MW-3 should also be analyzed for total petroleum hydrocarbons as diesel, oil and grease, and BTEX.

The above mentioned information/data would be required by this Department and the California Regional Water Quality Control Board to make a final decision on site closure. If you have any questions, you may reach me at (510) 567-6764.

Sincerely,

Madhulla Logan,

Hazardous Material Specialist

CC: Gary Colbert, Allwaste Transportation Inc, 395 Channel Road, Benecia, 94510

Sum Arigala, San Francisco Regional Water Quality Control Board, 2101 Webster Street, Oakland, CA

ALAMEDA COUNTY HEALTH CARE SERVICES

AGENCY DAVID J. KEARS, Agency Director



ARNOLD PERKINS, DIRECTOR RAFAT A. SHAHID, DEPUTY DIRECTOR

DEPARTMENT OF PUBLIC HEALTH 499 Fifth Street Oakland, California 94607

January 30, 1996

Mr. Kevin Gordon
Package Machinery Company
24 Scitico Road
Somersville, Connecticut - 06072

Ref: Former Eagle Packaging - 948 88th Street, Oakland, CA

Dear Mr. Gordon:

I am in receipt of the workplan dated December 1995, prepared by AllWaste Transportation and Remediation, Inc. for the above referenced property. The workplan has been reviewed and is acceptable with the following changes:

The proposed B location for boring B-15 is a better alternate than location A. Also, to get an accurate gradient, the B location should be moved towards the 88th Avenue (modified boring location map attached).

This Department should be notified prior to conducting any field work. If you have any questions, you can reach me at (510) 567-6764.

Sincerely,

Madhulla Logan,

Hazardous Material Specialist

CC: Gary Colbert, Allwaste Transportation Inc, 395 Channel Road, Benecia, 94510

Sum Arigala, San Francisco Regional Water Quality Control Board, 2101 Webster Street, Oakland, CA

ALAMEDA COUNTY HEALTH CARE SERVICES AGENCY



DAVID J. KEARS, Agency Director

RAFAT A. SHAHID, DIRECTOR

DEPARTMENT OF ENVIRONMENTAL HEALTH
State Water Resources Control Board
Division of Clean Water Programs
UST Local Oversight Program
1131 Harbor Bay Parkway
Alameda, CA 94502-6577
(510) 567-6700

November 15, 1995

Mr. Kevin Gordon
Package Machinery Company
24 Scitico Road
Somersville, Connecticut - 06072

Ref: Former Eagle Packaging - 948 88th Street, Oakland, CA

Dear Mr. Gordon:

I am in receipt of the soil and groundwater investigation report, dated September 1995, prepared by Allwaste Transportation and Remediation, Inc, (Allwaste) for the above referenced property.

In April/May 1994 10 soil samples were collected at 5 ft and 10 ft from 5 soil borings and the soil analytical results indicated concentrations of tetrachloroethylene (PCE) up to 29 ppb. In December 1994 and May 1995 6 additional borings B-6 thru B-11 were drilled based on the previous results. Out of the 6 borings, 3 borings B-6 thru B-8 were located upgradient. The laboratory results of soil samples indicates concentrations of PCE up to 63 ppb at 5 feet and 28 ppb at 20 feet.

Also, 1 grab groundwater sample was collected from each of the 6 borings. In the upgradient wells, there was 1 hit of PCE at 16 ppb, 2 hits of trichloroethylene (TCE) with concentrations of up to 40 ppb, 1 hit of cis-1,2 dichloroethylene (DCE) at 2.3 ppb and 1 hit of 1,1 DCE at 22 ppb. In the remaining wells (downgradient and cross gradient), the laboratory results indicated PCE up to 1520 ppb, TCE up to 940 ppb, cis,-1,2 DCE up to 1930 ppb, and Vinyl Chloride up to 25 ppb.

All pertinent documents have been reviewed by this Department and based on the information submitted to this Department, State and Federal Regulations, and professional judgement the following decisions have been made:

- 1. Although some of the upgradient wells indicated the presence of solvents in the grab groundwater samples, the concentrations in the upgradient wells were 2 orders of magnitude less than that found in the remaining wells. Hence, this data does not indicate an upgradient source as the main source of contamination. Also, the laboratory results of soil samples collected from the upgradient wells indicated the presence of solvents in the soil. This Department requires that atleast 3 groundwater monitoring wells be installed to adequately characterize the groundwater contamination.
- 2. In the phase 1 assessment, dated September 1993, prepared by Riedel Environmental Services,

Inc (Riedel), mentions surface markings that suggests a underground storage tank (UST) may be present in the northwest corner of the facility, near Area 8. Also, the remains of a pump island are still present on the site in the indicated area. For various reasons, a complete and accurate magnetometer survey could not be conducted on the site. A soil sample collected at 10 feet from boring B-5 during the April 1994 investigation by Allwaste, contained 60 ppm of total petroleum hydrocarbons and 80 ppm of oil and grease. Based on all this information, there is high likelihood that an underground storage tank is/was present on the referenced property. So, first an investigation should be performed to verify the presence of an UST and any related piping leading from the UST and additional soil and groundwater investigation may have to be conducted in this area to check for unauthorized release of petroleum hydrocarbons and related compounds.

3. The soil sample results obtained in the investigations conducted by Allwaste were compared to the Preliminary Remediation Goals (PRGs) set by the Region 9 Federal Environmental Protection Agency (September 1, 1995). Based on the EPA cleanup levels for a residential scenario, the solvent contamination found on site do not pose a threat to public health and no further action is required on this issue.

Please submit a workplan addressing the above listed issues within 45 days of receiving this letter. This a formal request for technial documents pursuant to Section 13267 (b) of the water code. The workplan has to be approved by this Department before initiating any field work. If you have any questions, you can reach me at (510) 567-6764.

Yours Sincerely,

Madhulla Logan

Hazardous Material Specialist

CC: Gary Colbert, Allwaste Transportation Inc, 395 Channel Road, Benecia, 94510

Sum Arigala, San Francisco Regional Water Quality Control Board, Oakland, CA

AGENCY





RAFAT A. SHAHID, DIRECTOR

DEPARTMENT OF ENVIRONMENTAL HEALTH 1131 Harbor Bay Parkway

Alameda, CA 94502-6577 (510) 567-6777

November 15, 1995

ATTN: Sirs

Hamilton, Cohn, Thatcher 8393 Capwell Dr Ste 100 Oakland CA 94621

RE: Project # 2589A - M

at 948 - 88th Ave in Oakland 94621

Dear Property Owner/Designee:

Our records indicate the deposit/refund account for the above project has fallen below the minimum deposit amount. To replenish the account, please submit an additional deposit of \$1,500.00, payable to Alameda County.

Please write your project number and site address on your check.

We must receive this deposit before we perform any further work on this project. At the completion of this project, any unused monies will be refunded to you or your designee.

If you have any questions, please contact Madhulla Logan at (510) 567-6700.

Since sely,

Tom Peacock, Area Manager Environmental Protection Division

c: files/inspector

ALAMEDA COUNTY HEALTH CARE SERVICES AGENCY

DAVID J. KEARS, Agency Director

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

DEPARTMENT OF ENVIRONMENTAL HEALTH

State Water Resources Control Board Division of Clean Water Programs UST Local Oversight Program 80 Swan Way, Rm 200 Oakland, CA 94621 (510) 271-4530

December 16, 1994

Gary Colbert All Waste Transportation and Remediation, Inc. 395 West Channel Road Benecia, C A - 94510

Ref: Eagle Packaging Facility - 948 88th Avenue, Oakland, California

Dear Mr. Colbert:

I am in receipt of the workplan, dated December 2, 1994 for the referenced property. The workplan has been reviewed in consultation with Sum Arigala of the San Francisco Regional Water Quality Control Board and is acceptable to this Department with the following changes:

- 1. All soil samples collected at 5 feet depth intervals from all 3 boring should be analyzed by a certified laboratory subsequent to being screened by a photoionization detector (PID).
- 2. Boring B-6 should be moved to a downgradient direction as discussed in our phone conversation.
- 3. In addition to being analyzed for metals, soil samples from boring B-8 should be analyzed for total petroleum hydrocarbons.

The approved workplan should be implemented within 60 days and this Department should be given a minimum of 3 days notice before starting any field work. If you have any questions or concerns, you may call me at (510) 567-6764.

Sincerely,

Madhulla Logan

Hazardous Materials Specialist

CC: Sum Arigala, San Francisco Regional Water Quality Control Board



Allwaste Transportation & Remediation, Inc.

8 August 1994

Ms. Madula Logan Alameda County Environmental Health Department Hazardous Materials Division 1131 Harborway Parkway Alameda, California 94502

Re:

948 88th Avenue, Oakland, California 94621

Dear Mr. Wang:

On behalf of the Package Machinery Company (PMC), Allwaste Transportation and Remediation, Inc. (ATR) is submitting the attached documents, *Phase-I Environmental Assessment, dated September 1993*, and *Soil and Asbestos Survey, dated May 1994*, for your review and comment. The work was performed by Riedel Environmental Services, Inc. (RES) and ATR, respectively, for the purpose of sale of the property to another private individual/firm.

During the Phase-I, RES noted areas that should be further studied during a Phase-II investigation to determine the potential presence of residual chemical constituents, utilized during past operations, in the soil/vadose zone. These areas were investigated during a Phase-II by ATR by advancing five (5) borings on the subject site to a total depth of 10 feet below ground surface (bgs). Samples were collected at 5 at 10 feet bgs. Two of the borings, in the areas near the old paint booth (B3) and the chemical storage area (B4) showed low concentrations of tetrachloroethene (PCE), a volatile organic compound. Laboratory analysis detected 29 and 14 parts per billion (ppb) PCE at 5 and 10 feet, respectively in boring B3, and 5 and 19 ppb PCE at 5 and 10 feet, respectively, in boring B4. The remaining borings showed volatile organic compounds below method detection limits. Ground water at the site is anticipated to be at 10.5 feet below ground surface.

The lack of higher concentrations of volatile organic compounds in borings B3 and B4, and the absence of these constituents in the remaining borings suggests that there is no wide spread problem across the site. It is the position of PMC that the site has been characterized, and that further study of the site is not warranted at this time.

PCM would appreciate a written comment stating the County's position, as they seek to finalize the property transfer as soon as possible.

395 West Channel Road ▲ Benicia, California 94510 ▲ (707) 746-8287 ▲ FAX (707) 746-0957

As discussed on the phone with you on 1 August 1994, please find a check in the amount of \$900.00 for County review time. Thank you for your assistance in this delicate manner. Should you have any questions or require additional information please call the undersigned at (800) 800-7472.

Sincerely,

Allwaste Transportation and Remediation, Inc.

Gary B. Colbert

Branch Manager